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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

VICTORIA COMFORT, an individual

Plaintiff,

vs.

JT FOXX aka JUSTIN T. FOXX aka JUSTIN  
GORENKO, individually and dba JT FOXX  
ORGANIZATION, dba JT FOXX  
SUBSCRIPTIONS, dba FOXX PRODUCTS;  
WORLD SUCCESS COMPANY LLC, a  
Florida limited liability company formerly  
known as THE COACHING  
ORGANIZATION LLC, dba MY  
COACHING ORGANIZATION, dba FIRST  
CLASS COACHING; and DOES 1 to 100,  
inclusive,

Defendants.

Case No.: 3:14-cv-4369-JST

**STIPULATION AND ~~PROPOSED~~  
ORDER TO STAY CASE PENDING  
ARBITRATION PROCEEDINGS**

STIPULATION AND ~~PROPOSED~~ ORDER TO STAY

1 THE PARTIES, THROUGH COUNSEL, STIPULATE TO THE FOLLOWING:

2 Whereas, Plaintiff Victoria Comfort brought this action, seeking damages and other relief  
3 against Defendants JT Foxx, World Success Company LLC, and The Coaching Organization,  
4 LLC;

5 Whereas, Defendants filed a Petition to Compel Arbitration on November 20, 2014,  
6 which is currently pending before the Court;

7 Whereas, the parties have agreed that the claims in this case will be arbitrated in San  
8 Francisco, California, before AAA Arbitration;

9 Whereas, the parties believe it would be economically efficient and promote justice for  
10 this action to be stayed pending the completion of the arbitration;

11 Now, therefore it is agreed that:

- 12 1. This action shall be stayed in its entirety;
- 13 2. All dates currently scheduled in this case shall be vacated;
- 14 3. Defendants' pending Petition to Compel Arbitration shall be removed from the  
15 Court's calendar, without prejudice to re-filing or re-noticing if circumstances warrant;
- 16 4. The parties will contact the Court within 30 days of the issuance of the arbitration  
17 award or other resolution of the arbitration proceedings, whichever is later, and this action will  
18 remain stayed pending further order of the Court.

19  
20 Date: December 30, 2014

/s/ Ruth Hawley  
Kaufhold Gaskin LLP  
Steve Kaufhold  
Ruth Hawley  
*Attorneys for Defendants JT Foxx,  
World Success Company LLC, and  
The Coaching Organization, LLC*

21  
22  
23  
24  
25 Date: December 30, 2014

/s/ Philip Terry  
Carle, Mackie, Power & Ross LLP  
Philip J. Terry  
*Attorney for Plaintiff Victoria  
Comfort*

~~PROPOSED~~ ORDER

The parties having stipulated, and for good cause shown, it is hereby ORDERED that:

1. This action shall be stayed in its entirety;
2. All dates currently scheduled in this case shall be vacated;
3. Defendants' pending Petition to Compel Arbitration shall be removed from the Court's calendar, without prejudice to re-filing or re-noticing if circumstances warrant;
4. The parties will contact the Court within 30 days of the issuance of the arbitration award or other resolution of the arbitration proceedings, whichever is later, and this action will remain stayed pending further order of the Court.

Date: January 1, 2015

